

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
(Bid Protest)

NATIONAL TELECOMMUTING
INSTITUTE, INC.

Plaintiff,

V.

THE UNITED STATES,

Defendant

and

PECKHAM VOCATIONAL INDUSTRIES, INC.,

Defendant-Intervenor

and

SOURCEAMERICA,

Defendant-Intervenor.

No. 15-293C

(Judge Wheeler)

NOTICE OF FILING OF THE DECLARATION OF RICHARD BEUTEL

Plaintiff, National Telecommuting Institute, Inc. (“NTI”) files this notice attaching the declaration of Richard Beutel, (Exhibit 1 to this notice), to clarify that Kaye Scholer LLP is not an Affiliated Organization to Mr. Beutel’s lobbying firm and to assure the Court that Kaye Scholer has not disclosed any protected information subject to the Court’s Protective Order to NTI or any other person or entity.

In its reply brief (ECF 86 at 13 and footnote 13), defendant-intervenor, Peckham Vocational Industries, Inc. (“Peckham”) makes the scurrilous accusation that the Court’s Protective Order in this case has been violated. Peckham also attached as Exhibit 1 to its brief

the Senate lobbying disclosure form filed by Richard Beutel of the lobbying firm Cyrrus Analytics, Inc. In that disclosure form, Mr. Beutel erroneously listed Kaye Scholer LLP as an “Affiliated Organization” to Mr. Beutel’s lobbying firm. Peckham further made an attenuated and outlandish claim attempting to link Mr. Beutel’s error to Peckham’s claims of violations of the Protective Order.

Undersigned counsel was surprised to learn that Mr. Beutel had listed Kaye Scholer as an “Affiliated Organization” on his registration form because, as reflected in the attached declaration from Mr. Beutel, Kaye Scholer has not participated in any of Mr. Beutel’s briefings with Congressional staff, contributed any money to Mr. Beutel’s lobbying activities, nor controlled or supervised Mr. Beutel’s lobbying efforts. As also demonstrated in the attached declaration, Kaye Scholer has not shared any protected information with Mr. Beutel or his lobbying firm.

Today, Mr. Beutel amended his lobbying registration form to reflect that no organizations are affiliated with him in connection with his representation of NTI. That amendment is attached to his declaration.

Dated: September 11, 2015

Respectfully submitted,

S/ Ronald K. Henry

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